

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: May 1, 2006

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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STATUS REPORT
Due May 1, 2006
CC Docket No. 94-102

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

E911 Compliance Officer: Jims Chandler
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New Compliance Officer:

Keystone Wireless, L.L.C. ("Keystone") has a new E-911 compliance officer, Jim Chandler. Mr. Chandler's contact information is specified above.

Information Regarding PSAPs:

As of Keystone's February 1, 2006 Status Report, Keystone had received four Phase I requests and Four Phase II requests. As previously reported in that Status Report, Keystone obtained and installed all of the network equipment and software necessary to meet the Phase I request from the Berks County PSAP, and is compliant with Phase I in that county. Keystone also reported that it was actively working with the Schuylkill County PSAP to complete the second Phase I deployment in that county using a NCAS solution. Keystone will be testing the Phase I service in that county during the second week of May 2006 and expects to complete that Phase I deployment by the end of May 2006, and at that point will be fully Phase I compliant in Schuylkill County. Keystone is actively working with the Lycoming County and Center County PSAPs to deploy Phase I E-911 in their respective counties. Keystone has received three additional Phase I/Phase II requests from PSAPs in Clinton County, Montour County and Northumberland County. Keystone is actively working with these PSAPs to deploy Phase I E-911 in their respective counties.

Keystone has kept these PSAPs updated on its progress in implementing a Phase II E-911 solution in their respective counties, and provided each of them with a copy of the Supplement and the February 1, 2006 Status Report. Keystone is having tri-weekly phone calls with Kimball & Associates, which represents the PSAPs for the counties of Center, Clinton, Lycoming, Montour and Northumberland. Keystone is in contact with the Schuylkill County PSAP on a weekly basis through Intrado, and contacts the Berks County PSAP director every couple of months to keep her apprised of its progress. None of these PSAPs has expressed any concerns or issues respecting Keystone's implementation of Phase E-911, which Keystone interprets as their consent to Keystone's Phase II E-911 implementation efforts.

Implementation of Phase II Service:

As previously reported, Keystone is committed to using a network-based solution for Phase II E-911 in its market and has been exploring the network-based solutions being developed by Polaris Wireless, Inc. ("Polaris") -- the Wireless Location Signature ("Polaris WLS") -- and by GBSD Technologies, Inc. ("GBSD") -- The Compass™ Location System ("The Compass™") -- among others. Keystone has provided GBSD with basic information respecting Keystone's network, and GBSD is currently preparing a network review based on The Compass™ technology. Keystone should receive a report from GBSD around the middle of this month.

Upon further analysis of Keystone's network based on the Polaris WLS technology, Polaris again concluded that its network-based solution would not be viable for Keystone's current network configuration because the Polaris WLS technology would not meet the Phase II E-911 accuracy requirements under §20.18(h) of the Commission's rules. For the Polaris WLS to be viable in Keystone's network, Keystone would have to construct many additional cell sites to even get close to meeting the accuracy requirements, cell sites that are not required for customer traffic and whose sole purpose would be to support the Polaris WLS Phase II E-911 solution. The costs for construction of all of these additional cell sites and the purchase of the required Polaris WLS equipment are prohibitive. In addition, Keystone's monthly expenses would increase greatly due to the need to lease additional space at all of its current cell sites for the Polaris WLS equipment. Keystone finds this to be the same situation with other network-based Phase II E-911 technologies it has explored. Notably, while the Polaris WLS technology, like the NORTEL option, would benefit from AGPS handsets, such handsets continue to be unavailable.

In light of the foregoing, Keystone does not anticipate that Phase II E-911 service will be available in its network in the near future. Keystone is continuing to search out and explore other network-based Phase II solutions in the hopes of finding a

viable solution for its market, and continues to aim toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network.

Construction of New Cells and Expansion of Coverage:

Keystone recently finalized its 2006 build-out plans for its network. Keystone anticipates that some time near the end of the second quarter or the beginning of the third quarter of the year, it will begin operating two new cell sites.